

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH ANDREW VALENZIA a/k/a : CHAPTER 13  
JOSEPH ANDREW VALENZIA, II :  
Debtor :  
: :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
: :  
vs. :  
: :  
JOSEPH ANDREW VALENZIA a/k/a :  
JOSEPH ANDREW VALENZIA, II :  
Respondent : CASE NO. 1-21-bk-00471

OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW, this 16th day August, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the debtor's exemptions for the following reason(s):

1. Trustee objects to debtor's exemption of assets claimed under 11 U.S.C. §522(d)(12) – IRA – Clark v. Rameker, 573 U.S. 122, 134 S.Ct. 2242 (2014).

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's Objection to Debtor's Exemptions.

Respectfully submitted,

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day August, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary Imblum, Esquire  
4615 Derry Street  
Harrisburg, PA 17111

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee